

US EPA ARCHIVE DOCUMENT

Brendan,

Based on our conversation the other day, we've been doing research into the PM-10 emission limit for the turbine. We've tried calling you several times today but you're a busy man and we've had no luck getting through. So in the interest of time, we're sending this note with our proposed limit and the rationale.

The application was submitted with a proposed PM-10 limit of 0.05 lb/MMBtu. Based on our discussions following the decision to move to ULSD, we have re-reviewed all of the permits issued in CT, EPA Regions 9 and 10 since the application was submitted. We have also gone back to Solar to get information about the unit itself and we can accept a PM-10 limit of 0.036 lb/MMBtu. This is lower than any other emission rate that is currently permitted in any of these areas for a unit of similar size and technology. The next closest (aside from the Forsyth unit discussed in the application) is the turbine that is going in at Yale and that rate is 0.039 on ULSD.

So, 0.036 lb/MMBtu is better than BACT for this unit and can be listed in the PSD permit. Assuming this is acceptable, is there any other information you need from us before the permit is issued? Thanks again for your attention to this pressing matter.

Tom Stoughton